

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THEIR
MOTION FOR SUMMARY JUDGMENT,
MOTION TO STRIKE TS 96, AND
DAUBERT MOTION**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
7 Ottomotto, LLC’s Administrative Motion to File Under Portions of Their Motion for Summary
8 Judgment, Motion to Strike TS 96, and *Daubert* Motion (the “Administrative Motion”). The
9 Administrative Motion seeks an order sealing highlighted portions of Uber’s Motion for Summary
10 Judgment, Motion to Strike TS 96, and *Daubert* Motion (“Uber’s Motion”) and Exhibit 2 to the
11 Declaration of Esther Chang, as well as the entirety of Exhibit 1 thereto.

12 3. The portions of Uber’s Motion marked in red boxes, the entirety of Exhibit 1, and the
13 green highlighted portions of Exhibit 2, contain or refer to trade secret information, which Waymo
14 seeks to seal.

15 4. Uber’s Motion (portions marked in red boxes in version filed herewith), Exhibit 1
16 (entire document) and Exhibit 2 (green highlighted portions) contain, reference, and/or describe
17 Waymo’s asserted trade secrets or information that, from context, tends to disclose Waymo’s asserted
18 secrets. The information Waymo seeks to seal includes the confidential design and functionality of
19 Waymo’s proprietary autonomous vehicle system, including its LiDAR designs, which Waymo
20 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-
21 47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The public disclosure of
22 this information would give Waymo’s competitors access to descriptions of the functionality or
23 features of Waymo’s autonomous vehicle system. If such information were made public, I understand
24 that Waymo’s competitive standing would be significantly harmed.

25 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Motion and
26 Exhibits 1 and 2 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on September 15, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.
11

12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven
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